

W/I

United States District Court

EASTERN

DISTRICT OF

MICHIGAN

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

V.

CASE NUMBER 03-80406

FADI ABDUL-LATIF HAYDOUS,
a/k/a Husseimm Haydous,
a/k/a Fadil Haydous,

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about November 26, 2002 in Wayne county, in the Eastern District of Michigan defendant(s) did, (Track Statutory Language of Offense)

Interstate transportation of counterfeit state cigarette tax stamps.

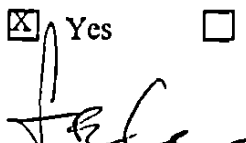
in violation of Title 18 United States Code, Section(s) 2314

I further state that I am a(n) Special Agent and that this complaint is based on the following facts:

(SEE ATTACHED AFFIDAVIT)

Continued on the attached sheet and made a part hereof:

☒ Yes ☐ No



Signature of Complainant
Jason Cox, Special Agent


Sworn to before me and subscribed in my presence,

4/23/03
Date

at Detroit, Michigan

City and State

United States Magistrate Judge
Name & Title of Judicial Officer



Signature of Judicial Officer
M-1
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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

AFFIDAVIT

Jason E. Cox, being duly sworn upon oath, deposes and says:

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) in the Detroit field office. I have been so employed since July 2000. I was previously employed for 3 ½ years as a Deputy United States Marshal. I am currently responsible for investigations relating to contraband cigarette trafficking, to include the interstate transportation of counterfeit state cigarette tax stamps.

2. During the mid - late 1990's, the ATF-Buffalo office, in concert with state and local authorities, conducted a long-term investigation of an organized contraband cigarette trafficking group. As a result of this investigation, during October 1999, a Federal Grand Jury, convening in the Western District of New York, returned a true-bill indictment charging numerous individuals with violations of Title 18, United States Code, Section 2342, contraband cigarette trafficking. One of the individuals charged was Fadi Abdul-Latif Haydous, of Dearborn Heights, Michigan. On January 22, 2002, Haydous appeared in the United States District Court, Western District of New York, Buffalo, New York and entered a guilty plea to one count of Title 18, United States Code, Section 2342. Haydous was subsequently released on bond pending sentencing. Haydous has not been sentenced.

3. During November/December 2001, the ATF-Detroit Field Office and the United States Postal Inspection Service conducted an investigation relating to Haydous' involvement in

the interstate transportation of counterfeit state cigarette tax stamps. This investigation was predicated upon discovery that on November 26, 2001, an Express Mail package, Label No. ET 390 572 020 US was entered into the U.S. mails in Dearborn Heights, Michigan. This parcel was described as follows:

- A. Addressed to: Tony Touma, 61-24 232 St., Oakland Garden, NY 11364
- B. Return Address: Mike Bazzi, 26923 Shehan Street, Dearborn Heights, MI 48127
- C. Size: Approximately 11" x 12" x 10"
- D. Weight: Approximately 6 pounds, 11.7 ounces
- E. Postage Affixed: A postage meter strip for \$30.45
- F. Physical description: White rectangular cardboard box; sealed with clear stripping tape; address information written in blue ink.

4. Investigation by the U.S. Postal Inspection Service determined that the above-described package had been shipped to New York City and returned because of a bad address on the package. On December 3, 2001, United States Magistrate Judge Paul J. Komives, United States District Court, Eastern District of Michigan, Detroit, Michigan, issued a search warrant to the U.S. Postal Inspection Service, for this package. On December 3, 2001, U.S. Postal Inspection Service Inspector's searched this package and determined that it contained approximately 150,000 New York state cigarette tax stamps. These stamps were subsequently examined by the MEYERCORD Revenue Company, Carol Stream, Illinois, and were found to be counterfeit. The MEYERCORD Revenue Company is the authorized manufacturer of U.S. cigarette tax stamps.

5. The U.S. Postal Inspection Service determined that an individual had called the post office on numerous occasions regarding the above-described package. This individual identified

himself as the owner of the package and the telephone number he was using was 313-445-5555.

On December 6, 2001, a phone call was placed to the Postal Service from 313-445-5555 regarding the package. The caller asked that the package be returned to 26969 Rochelle in Dearborn Heights, Michigan.

6. On December 6, 2001, Postal Inspectors went to 26969 Rochelle in Dearborn Heights. After knocking on the front door, they were greeted by an individual who was later identified as FADI HAYDOUS. The Postal Inspector identified himself to HAYDOUS at the door and asked him if he was "Mike," to which he replied "yes." The Postal Inspector then asked him if he was Mike Bazzi, to which he replied no, that his name was FADI. The Postal Inspector asked FADI for identification and he was able to produce a Michigan driver's license. The Postal Inspector advised FADI that he had the package that was supposed to be returned to his address. FADI advised that he was doing it for a friend, one Ali Bazzi.

7. HAYDOUS subsequently accompanied the Postal Inspector to his office, where he was interviewed further regarding the above-described package. During this interview, HAYDOUS stated that he had shipped the package of stamps in question through the mail. HAYDOUS advised that the stamps were to be shipped to somebody by the name of "Tony Touma" but there was a mix up in the address. HAYDOUS advised that he did not really know who Tony was but he may have met him several years ago. HAYDOUS advised that he was selling the stamps to Tony Touma. HAYDOUS stated that he had the package of stamps for approximately 3 years and that he wanted to get rid of it. HAYDOUS advised that he obtained the stamps from a Lebanese male from either North or South Carolina. HAYDOUS described this male and stated that he paid approximately \$2000 for the stamps.

8. Your affiant has learned through public source information that as of October 2001,

the State of New York tax rate was \$1.11 per pack of cigarettes. Accordingly, if the counterfeit State of New York cigarette tax stamps shipped by Haydous, were utilized, the loss to the State of New York would have been approximately \$166,500.

9. Your affiant has learned from other law enforcement officers that since the above-described seizure of counterfeit cigarette tax stamps from HAYDOUS, during late 2001, that he continues to engage in various criminal activities, including trafficking in counterfeit goods, as well as contraband and counterfeit cigarette trafficking.

10. Your affiant has been advised by other law enforcement officers that HAYDOUS utilizes the alias, "Husseimm Haydous." Your affiant has determined through public source data bases that Husseimm Haydous, SSAN 373-17-9524, is associated with 26969 Rochelle, Dearbron Heights, Michigan. On 4/18/03, your affiant also determined that on February 4, 1999, HAYDOUS obtained a Michigan driver's license, number H-320-244-004-285, as well as a Michigan personal identification card, under the alias name, "Fadil Haydous," and alias date of birth, "4/12/73." Your affiant has learned from a review of Michigan Secretary of State records, that HAYDOUS utilized an Albanian birth certificate, Albanian marriage certificate and an international driver's license in the name of "Fadil Haydous" to obtain this false Michigan drivers' license and personal identification card.

11. FADI ABDUL-LATIF HAYDOUS, also known as Fadil Haydous, Husseimm Haydous, is described as a Lebanese male, date of birth April 12, 1974, height 6'2", 220 pounds, Social Security Account Number (SSAN) 373-17-9523, residence 26969 Rochelle, Dearborn Heights, Michigan.



Jason E. Cox
Special Agent

Bureau of Alcohol, Tobacco, Firearms and Explosives
Detroit, Michigan

Subscribed and sworn to before me this 23^d day of April, 2003.

Thomas A. Gith
U.S. Magistrate Judge